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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY PRODUCTS  
13 LIABILITY LITIGATION

14 THIS FILING RELATES TO:

15 ALL ACTIONS  
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MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**DECLARATION OF RAVI SINHA IN  
SUPPORT OF OMNIBUS JANUARY 17  
SEALING FILING REGARDING  
PLAINTIFFS' SECOND AMENDED  
MASTER COMPLAINT (PERSONAL  
INJURY)**

I, Ravi Sinha, declare and state as follows:

1. I am Head of Child Safety Policy at Meta Platforms, Inc. (“Meta”). In 2020, I joined Meta as a Safety Policy Manager and became a human exploitation lead for policy. Previously, I served as a federal prosecutor in the U.S. Department of Justice with a focus on prosecuting child exploitation and sex trafficking cases. I submit this Declaration in support of Meta’s January 17, 2024 sealing filing regarding Plaintiffs’ Second Amended Master Complaint (Personal Injury) (“SAMC”). I make all statements in this Declaration based on my own personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. The following portions of Exhibit B to the SAMC, a complaint filed by the Attorney General of New Mexico, include information that could enable online predators and other bad actors to avoid detection and/or enforcement on Meta’s services:

Paragraph	Portion To Be Sealed
248	From after “with children:” to before “this is the worst”
248	From after “Also because” to before “Elsewhere, Meta”
248	From after “Meta acknowledged” to before “of Tier 2”
248	From after “communication services;” to before “and warned”
259	In image from after “State of Play” to before “Data: under”
259	In image from after “valuable insights” to before “User education”
259	In image from after “size limitations” to bottom of image column
259	In image from after “significant investment” to before “in x-industry”
259	In image from after “resource hub” to before “Offer legislative”
264	From after “as a friend and” to end of paragraph

3. The above-listed information concerns Meta’s detection, reporting, and prevention systems, policies, or processes regarding child sexual exploitation, including child sexual abuse material (“CSAM”).

4. The above-listed information is highly sensitive and Meta does not publicly reveal it.

5. Disclosure of the above-listed information could enable online predators and other bad actors to evade detection and/or enforcement.

6. Predators and other bad actors can be highly sophisticated, work together, share information with one another, and use constantly evolving tactics to seek to circumvent safety

1 mechanisms. For example, in my experience, groups of predators will create and disseminate  
2 comprehensive guides on how to locate, contact, exploit, and abuse minors and to evade detection.

3 I declare under penalty of perjury that the foregoing is true and correct under the laws of the  
4 United States. Executed on January 17, 2024, at San Francisco, California.

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6 DocuSigned by:  
7 *Ravi Sinha*  
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9 Ravi Sinha  
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